

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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)	
IN RE RIO PIEDRAS EXPLOSION)	Case No.96-2443
)	
v.)	INDIV CASE97-2668
)	97-2669
)	
)	
)	

**DECLARATION THAT PARTY WAS UNABLE TO FILE IN A TIMELY MANNER
DUE TO TECHNICAL DIFFICULTIES**

Please take notice that Come now Plaintiffs, Ramona Acosta heirs, Arcadio Jimenez only heiress, Elvin Acosta, and Rolando Diaz Peralta as represented by his mother, Aida Peralta and most respectfully appear to report that we were unable to file the attached Motion to Reply to a U.S. Magistrate Order in a timely manner due to technical difficulties. The deadline for filing the above mentioned motion was [June 15th 2004].

The reason(s) that I was unable to file said motion in a timely manner were my IBM laptop computer malfunction and the good faith efforts I made prior to the filing deadline to both file in a timely manner and to inform the Court and the other parties that I could not do so are set forth below.

Given the fact that said malfunction occurred beyond regular duty hours I was unable to request and receive technical support to properly reinitiate normal functioning before 12 midnight of June 14th.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted, at San Juan, Puerto Rico, June 15th, 2004

s/

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Attorney for Plaintiff
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